Mitigated Negative Declaration

PROJECT NAME: Conditional Use Permit for Temporary

Championship Off-Road Race 2007

PROJECT LOCATION: East of the existing terminus of Main Street, east of

Heritage Road

ASSESSOR'S PARCEL NO.: 644-030-19-00, 644-060-06-00, 644-060-07-00,

644-060-08-00, 644-060-09-00, 644-060-12-00

PROJECT APPLICANT: James P. Baldwin

CASE NO.: IS-07-030

DATE OF DRAFT DOCUMENT: April 21, 2007

DATE OF RESOURCE

CONSERVATION COMMISSION

MEETING:

DATE OF FINAL DOCUMENT:

PREPARED BY: Glen Laube, Environmental Projects Manager

A. BACKGROUND

As described in detail in Section B below, the proposed project is the temporary use for Championship Off-road Racing (CORR), of a portion of the Rock Quarry located adjacent to the Otay River Valley, a portion of Otay Ranch Village Three (parking), and the western Active Recreation Area within the Otay River Valley (camping). CORR was held on the Village Two and Four project sites for the 2005 and 2006 temporary race events, subject to Conditional Use Permits (CUP) for those events.

This MND (hereinafter referred to as MND IS-07-030) evaluates the potential environmental effects from site preparation, off-road racing and post-racing activities associated with the proposed two-weekend 2007 race events. This MND has been prepared by the City as the lead agency and in conformance with §15070, subsection (a), of the State CEQA Guidelines.

B. PROJECT DESCRIPTION

The proposed project is a temporary event involving off-road racing on the portion of the Rock Quarry located adjacent to the Otay River Valley, a portion of Otay Ranch Village Three (parking) and the western Active Recreation Area within the Otay River Valley (camping) (Figures 1 and 2). The event will occur over two, non-consecutive weekends, June 8 – 10 and September 28 – 30, 2007. Site preparation will include installation of grandstands, security lighting and fencing, orange bio-fencing to restrict access to the City's MSCP Preserve, signage for sensitive habitat areas, and storm water BMPs. The racing venue is proposed within the southern portion of the Rock Quarry which is no longer subject to resource extraction operations. Parking will occur on agricultural land within a portion of Otay Ranch Village Three. Vehicular entrances to parking lots will be via existing dirt roads from Main Street, Heritage Road, and Energy Way. Event sponsors and the City will provide fire, police and emergency services. A temporary traffic control plan will be developed to facilitate arrival and departure from parking lot areas. Overnight camping is proposed within a 27-acre parcel designated for "Active Recreation" within the City's General Plan. Races will occur during daytime hours only; however, temporary night lighting will be provided for security purposes. Permits will be required to address non-storm water discharges. The project requires a Conditional Use Permit.

Event-related activities include:

- 1. Races on Saturdays and Sundays of event weekends.
- 2. Pre-race track trials and qualifications (Friday before event weekends)
- 3. Friday through Sunday overnight camping for race participants and event attendees on event weekends.
- 4. Event Parking.
- 5. Nighttime security lighting.
- 6. Limited fire works.
- 7. Live music before, during and after race events.

The site layout and orientation of uses for the proposed CORR are graphically depicted on *Figure 3*. The site plan includes a temporary racetrack, stands/bleachers for spectators, food areas, pit areas for race participants, a camping area, and parking areas. The project proposes to include structural elements to provide sound attenuation, including installation of plywood to the back of the grandstands. The plywood barrier would be mounted on the back of four grandstand structures, each measuring 234 feet in width and 60 feet in height. The thickness of the plywood would be a minimum ½ inch. The project also includes fencing to provide security and to avoid unauthorized access to adjacent Preserve areas. The location of sound attenuation elements and

fencing are also shown on *Figure 3*. Additional noise attenuation is provided by existing terrain/topography on the north and east sides of the track area. Specifically, an approximate 15 foot-high shear rock face separates the track from the adjacent open space areas located to the east.

It should be noted that quarry operations are ongoing within the boundaries of and pursuant to an approved Reclamation Plan under the California Surface Mining and Reclamation Act. Grading and leveling of the track is being conducted under the Reclamation Plan and is not subject to additional environmental review or approvals by the City of Chula Vista. As noted above, site preparation that is considered part of the use that is subject to the CUP includes installation of grandstands, security lighting and fencing, orange bio-fencing to restrict access to the City's MSCP Preserve, signage for sensitive habitat areas, and storm water BMPs. Also, this MND addresses all activities that are associated with the race operation, including the use of the track that is created under separate permits.

CORR Access and Parking

It is anticipated that the CORR event will draw approximately 10,000 spectators per day from the San Diego County region. Freeway access to the CORR event will be from the Main Street interchange at I-805, located approximately two miles to the west. Entrances into the race area will be provided from Wiley Road, which is the existing quarry access road, and Energy Way located within the industrial area south of the Otay Landfill.

A total of 7,440 parking spaces will be provided in the designated parking area within Village Three. Access to the Village Three parking area will be provided Energy Road to the west. A shuttle will be provided to transport patrons from the camping area to the track area. The Village Three parking area is on agricultural land that has been mowed. By maintaining the root structure, dust will be minimized in these areas, and agricultural activities can resume after the last CORR event.

Access to the parking area in Village Three will require minor modifications to the cul-de-sac located at the eastern terminus of Energy Way. Modifications to the Energy Way cul-de-sac include temporary replacement of the existing curb and chain link fence with asphalt driveway an ancillary BMPs including but not limited to crushed gravel and/or "rumble plates". Temporary BMP to be employed at this location are further detailed in the project's Storm Water Pollution Prevention Plan (SWPPP).

No race-event parking will be permitted in non-designated areas. Race-event staff members will be positioned to direct race spectators into designated parking areas. Parking will be prohibited along Wiley Road, east of Main Street with the exception of the designated VIP parking areas

located within the southwestern area of the existing quarry site that are currently used for transport staging and weigh-in (i.e., scales area).

Access to the camping area will be provided via an existing dirt road located off existing Heritage Road. From the camping area, race patrons will be shuttled across the Otay River via an existing, elevated easement road. Pedestrian access through Wolf Canyon and across the Otay River will be prohibited and monitored by on-site security staff.

Site Preparation Phase

Site preparation activities associated with site preparation involve minor leveling of the track and other previously graded areas, mowing of previously mowed areas, set up for the pit area for race crews, spectator stands and food service areas, and installation of Best Management Practices (BMPs) to control erosion and sediment transport and to contain hazardous material storage areas. As noted previously, the track and surrounding areas within the boundary of the Reclamation Plan will be graded/leveed as part of the reclamation activities of the existing quarry.

Existing dirt access roads off of Main Street will provide access to VIP parking areas and the race event area. No new grading will be required for the access roads. Watering of the access roads and all cleared areas will occur throughout site preparation to minimize dust emissions. Gravel may also be laid down at transition areas from dirt to paved surfaces to reduce dust.

The maintenance area for race vehicles (pit areas) will be located to the west of the racetrack (Figure 3). These areas, as well as the storage area for hazardous materials/waste and restroom areas, will be lined with an impervious material to prevent spills and potential leakage of automobile fluids and other materials into the ground or any waterways. In addition, any storage, handling or disposal of hazardous materials/waste will be in accordance with local, state and federal laws.

Because the CORR event is temporary, no permanent utilities will be constructed. Generators for lighting and electricity will be brought onto the site, as well as portable restrooms facilities and water. Temporary stands/bleachers and any equipment needed for the spectator and entertainment areas will also be provided by the event sponsor.

Installation BMPs as described in the SWPPP for the project will be required during site preparation. The BMPs are required to control erosion, stabilize manufactured slopes, reduce site runoff and protect water quality. The required BMPs for this phase are described in Attachment A, *Implementation of Best Management Practices for Storm Water Pollution*

Prevention at the Otay Ranch Championship Race Track Site. The specified BMPs will require approval by the Director of Public Works and will be monitored throughout the event.

Race Event Phase

Race events will occur over two, non-consecutive weekends, June 8-10 and September 28-30. Race event hours will be generally from 7 a.m. to 7 p.m. on Saturdays and Sundays. Practices will occur on the Fridays before the event from 10 a.m. to 4 p.m. Actual racing on the weekend will begin during a one-hour practice session from 9:30 to 10:30am. On the race event days, up to six races will be held each day of the event. The last race will conclude at approximately 3 p.m. Limited non-racing weekday activities would involve registration and technical inspections. The CUP will require that no race car engines shall be operated before 8 a.m. and no racing on the track will occur before 9:30 a.m.

No helicopter flights are proposed in conjunction with the race events.

Post race events may include an awards ceremony, which will conclude at sunset. Loud speakers, microphones and other audio-visual equipment will be provided to announce races. Night lighting for security purposes will be limited to the pit area, overnight camping and vendor staging areas. Live music will occur throughout the race event. No nighttime concerts are proposed.

Overnight camping will be permitted for event attendees (up to 150 camping spaces). The camping area would consist of 27.2 acres and would be located southeast of the proposed race track within the designated Active Recreation Areas of the Otay River Valley. Security will be provided in the camping area from the end of the last race to 7 a.m. the following day. Use of the track after the final race will not be permitted. Security staff will have cell phones and will have direct access to City of Chula Vista Police Department. Specific requirements for onsite security will be outlined in the Security Plan to be prepared by the applicant and approved by the Chief of Police.

During the time in-between the weekend race events, the race areas will be closed off to the public. The safety/security plan prepared for the project will require that the gate surrounding the race areas is locked. During the weekend race events, access to the race areas would also be locked after race activities have ceased for the day, and access to the site will only be permitted for race participants, crew members, and security staff. Racing events will not be held if it rains.

Race participants will arrive on the Wednesday before the race events. Equipment, race vehicles and some race participants/crews will remain onsite for the duration of the weekend race event.

Security, fire and medical services will be provided on each weekend of the CORR events. The event sponsors will have security personnel onsite, at entrances and other offsite locations, as needed. The City of Chula Vista Police Department will provide supplementary law enforcement services. In addition, the City of Chula Vista Fire Department and an emergency medical service provider will be available in case of medical emergencies. A security plan and emergency medical plan will be prepared by the project applicant and will be approved by the City Police and Fire Departments, respectively, prior to the start of the race events. In addition, a traffic control plan will be developed to facilitate arrival and departure from the event and will require approval by the City Police Chief and City Engineer prior to the start of race events.

Maintenance of racing vehicles will occur within the designated pit areas. Maintenance may include refueling, mounting racing wheels, and checking/refilling of fluids. General clean-up and trash pick-up of the pit area, spectator stands, food/beverage area and parking lots will occur on a daily basis. Access roads, parking lots and the race track will be watered to minimize dust emissions.

Installation BMPs as described in the SWPPP will be required during the race events. The BMPs are required to provide containment of hazardous materials storage areas, deter seepage of potentially toxic substances into the soil, minimize sediment transport off-site, control dust, minimize site runoff, prevent trash from entering the MSCP Preserve area and protect water quality. The required BMPs for this phase are described in Attachment A, *Implementation of Best Management Practices for Storm Water Pollution Prevention at the Otay Ranch Championship Race Track Site*. The specified BMPs will require approval by the Director of Public Works.

Post Race Event Phase

Post-event activities essentially consist of site clean up and soil stabilization of exposed slopes. All trash and debris generated by the proposed project will be removed. All temporary structures, stands, bleachers, canopies, portable restroom facilities, and power generators will be disassembled and removed from the site within two-weeks following the September 2007 race event. Any containers with hazardous materials/waste will be properly disposed of in accordance with local, state, and federal laws.

Installation BMPs as described in the SWPPP will be required during the post-race event phase. The BMPs are required to minimize site runoff, protect water quality and encourage revegetation of manufactured slopes and graded areas. The required BMPs for this phase are described in Attachment A, *Implementation of Best Management Practices for Storm Water Pollution*

Prevention at the Otay Ranch Championship Race Track Site. The specified BMPs will require approval by the Director of Public Works.

BMPs that provide for erosion control and reduction of sediment transport into drainages, including desilt basins and silt fencing, will remain in place.

Discretionary Actions/Other Project Approvals

A Conditional Use Permit (CUP) will be required to conduct the proposed CORR events. The following additional approvals will be required in order to implement the proposed project.

- City of Chula Vista Engineering: approval of BMPs and traffic control plan;
- Amendment to Chula Vista Municipal Code (CVMC) Chapter 5.44.101, for allowance of vehicles with internal combustion engines
- City of Chula Vista Police Department: approval of security plan and traffic control plan; and
- City of Chula Vista Fire Department: approval of emergency medical plan.

C. PROJECT SETTING

The proposed project site is located within a portion of Otay Ranch, in southern San Diego County, California (Figure 1). Specifically, the project area occupies a total of approximately 150 acres east of the location where Main Street turns into the alignment of Heritage Road, in the City of Chula Vista as shown in Figure 2. The existing quarry access road generally forms the southern border of the proposed track/pit/grandstand area, with the Otay River located adjacent to the south of the track area, and Wolf Canyon to the west of the track area. The existing site conditions consist of land that has been fully disturbed by ongoing aggregate mining and processing operations. Current mining operations include rock drilling, blasting, resource extraction and processing, stockpiling of construction aggregate and waste products, and transportation of processed materials from the site to serve the market.

The CORR racetrack, location of parking areas and other uses associated with the proposed project were intentionally sited and designed with fully disturbed areas in order to avoid any direct impacts to sensitive biological resources. The CORR track, pit area, spectator stands, food/beverage area, camping area, restrooms and VIP parking areas, consist of previously disturbed areas associated with previous surface mining activities. The southern portion of the project, including portions of the pit and vender areas, is located within an area designated as Preserve within the City's MSCP Subarea Plan. It's important to note that this area was previously disturbed as a result of an unauthorized encroachment by a former quarry operator.

Subsequent to the encroachment, the existing quarry's reclamation plan was amended to include a conceptual restoration plan to restore this area back to a level consistent with the adjacent undisturbed Preserve areas to the south. In accordance with the quarry's approved reclamation plan, the reclamation of this area back to Preserve is scheduled to occur sometime within the next 25 years.

Surrounding land uses include the active portion of the Otay Ranch Quarry to the immediate north and open space/Preserve areas to the immediate east, south, and west. Land uses within the general vicinity of the project site include Otay Ranch Village Three and the Otay Landfill to the northwest, developed residential uses within the City of San Diego to the south, and the Coors Amphitheater and Knott's Soak City Water Park to the southwest.

D. PRIOR APPROVALS AND ENVIRONMENTAL DOCUMENTATION

Otay Ranch General Development Plan/Subregional Plan Program EIR

The Final Program Environmental Impact Report (Program EIR #90-01) for Otay Ranch General Development Plan/Subregional Plan (GDP/SRP) was prepared and certified jointly by the City of Chula Vista and County of San Diego. The Program EIR 90-01 addresses the environmental impacts of implementation of the Otay Ranch GPA/GDP/SRP and related documents, which include Facility Implementation Plans, a Village Phasing Plan, Phase One Resource Management Plan (RMP), and a Service/Revenue Plan. As part of Program EIR 90-01, a Mitigation Monitoring and Reporting Program (MMRP) was prepared to define implementation of the mitigation measures described in the Program EIR. The Otay Ranch GDP/SRP designates the site for residential and mixed use development. Relative to the project site, the Program EIR identified significant noise, biological resources, air quality, geology, cultural resources, paleontological resources and cumulative agricultural resource impacts associated with build-out of the site in accordance with the GDP.

Village Two, Three and Four (portion) SPA Plan and TM Second Tier EIR

The primary parking area for the CORR event is located within the Otay Ranch Village Three planning area. In accordance with the General Plan and Otay Ranch GDP, the site (as part of Village Three) is planned for industrial and open space uses. A SPA Plan has been prepared for Otay Ranch Villages Two, Three and portion of Village Four. A final EIR was certified for the proposed SPA and TM (EIR #02-02), on May 23, 2006. The EIR addresses buildout of Village Three in accordance with the SPA. Industrial uses are planned for the subject CORR event parking area. The EIR identified the following environmental issue areas as significant and unmitigable: Relative to the project site, this Second Tier EIR identified significant noise, biological resources, air quality, geology, cultural resources, paleolontological resources and

cumulative agricultural resource impacts associated with build-out of the site. Mitigation measures were provided to reduce impacts to these resources.

Issues addressed in the EIR that are relevant to the proposed action include potential impacts associated with air quality, and geology and soils. In addition, data from biological surveys for this project were used to address biological impacts for the proposed 2007 CORR events.

Hanson Aggregates Pacific Southwest, Inc., Otay Ranch Pit Amended Reclamation Plan, MND

The VIP parking area, pit area, track, and grandstands are fully located within the existing boundaries of the Otay Ranch Quarry Reclamation Plan. In April 2006, the State Mining and Geology Board prepared an MND that evaluated an amendment to the sites original reclamation plan approved by the County of San Diego in 1980 (RP79-09). The amendments included adjusting limits of the active quarry operations to include areas that were disturbed by a former quarry operator as a result of on-going extraction operations. The proposed amendments revised the current reclamation plan boundaries to include approximately 38 acres of fully disturbed land and subtract approximately 29 acres of undisturbed land located within adjacent Wolf Canyon. Additionally, the proposed reclamation plan included a revised termination date for surface mining operations, identified a post mining land use, established monitoring criteria for mining operations, and provided a conceptual landscape/restoration plan and phasing for implementing the ultimate reclamation design. The MND addressed impacts associated with cultural resources, hazards and hazardous materials, and found them to be significant but mitigable.

E. COMPLIANCE WITH ZONING AND PLANS

City of Chula Vista General Plan

The City of Chula Vista updated its General Plan in December 2005. General Plan land use designations on the project site include Industrial (Parking Areas), Open Space Active Recreation (Camping Areas), and Open Space (Non-Preserve), (Track Area). Because the use is temporary and subject to a Conditional Use Permit, a consistency determination relative to General Plan land use designations is not applicable. However, the Open Space Active Recreation designation includes outdoor campgrounds as one of the intended uses within these areas. In addition, Parking is an allowable use within Industrial use designated areas.

Otay Valley Regional Park Concept Plan

The Otay Valley Regional Park (OVRP) Concept Plan was adopted in July 1997 by the Cities of San Diego and Chula Vista, and the County of San Diego. The OVRP identifies active recreation areas that are not a part of the Preserve, but are surrounded by Preserve areas. The OVRP Concept Plan does not change existing zoning or planned land uses, or add new development regulations, nor does it preclude private development in designated recreation areas consistent with existing zoning or planned land uses. The proposed project is a temporary use and would not prohibit future planning or use of the area, as contemplated in the OVRP.

Otay Ranch General Development Plan

The GDP identifies development of the Otay Ranch in a series of 15 Villages and 5 Planning Areas. These Villages and Planning Areas combined would allow approximately 13,000 single-family residential dwelling units and approximately 11,000 multi-family units. As mitigation for impacts to sensitive biological resources within the proposed development areas of the Otay Ranch, a Resource Management Preserve ("Preserve") was identified. The Preserve and associated policies and requirements related to biological resources protection are outlined in the Resource Management Plan, Phases 1 and 2, as further described below. Areas within the Preserve were assigned a land use designation of Open Space in the GDP/SRP. The proposed project includes land designated for industrial use in Village Three, Open Space Active Recreation, and "Not a Part" (the boundaries of the parcel containing the rock quarry). Because the use is temporary and subject to a Conditional Use Permit, a consistency determination relative to General Development Plan land use designations is not applicable. However, the Open Space Active Recreation designation includes outdoor campgrounds as one of the intended uses within these areas. In addition, Parking is an allowable use within Industrial use designated areas.

Otay Ranch Resource Management Plan (Phase 1 and 2)

In addition to the General Development Plan, the Otay Ranch planning documents include the Resource Management Plan (RMP), Phases 1 and 2 (adopted October 28, 1993 and June 4, 1996, respectively). The goal of the Otay Ranch RMP is to establish a permanent preserve within Otay Ranch to protect and enhance biological, paleontological, cultural and scenic resources; maintain biological diversity, and promote the survival and recovery of native species and habitats. The RMP Phase 1 ("RMP1") was adopted by the County of San Diego and the City of Chula Vista, concurrent with approval of the Otay Ranch GDP/SRP. The RMP1 provides general biological information and establishes overall Preserve conservation and management goals. The RMP1 also provides performance standards for preservation of biological resources. The RMP Phase 2 ("RMP2") provides detailed biological studies, specific plans and programs for habitat

management, and a habitat conveyance plan. As development occurs in Otay Ranch, habitat is conveyed to the City and the County with an undivided interest. The RMP2 establishes a habitat conveyance schedule, requiring that 1.188 acres of habitat is to be conveyed for each acre of land developed. The proposed project will not be required to convey preserve land, primarily because it is not a permanent use, and conveyance of preserve land would be triggered by final maps associated with a development project. Also, it should be noted that the portions of the project located in the area identified as "not a part" in the Otay Ranch GDP and RMP would not be subject to any of the requirements of the RMP or GDP, including conveyance requirements.

An important part of the RMP1 is the creation of the Otay Ranch Preserve. The Otay Ranch Preserve is a "hard-line" preserve (indicating that all of the areas designated as Preserve would be set aside for resource conservation purposes). The Otay Ranch Preserve includes approximately 11,375 acres of land to be set-aside as mitigation for impacts to sensitive resources resulting from Otay Ranch development that will occur both within the City and in the County. The Otay Ranch Preserve has been designed and is proposed to be managed specifically for protection and enhancement of multiple species present on Otay Ranch. These conservation lands will also serve to connect large areas of open space through a series of wildlife corridors.

Portions of the project are proposed within the RMP Preserve (Camping Area), and portions are within areas designated as development (Track Area and Parking Area). The RMP identifies active recreation use within portions of the Preserve designated areas of the Otay River Valley (Camping Area), consistent with the GDP. The proposed camping use is consistent with the active recreation designation for the area within which it is proposed, but as noted previously, all of the proposed uses are temporary and would not preclude implementation of the RMP.

Otay Ranch Pit Reclamation Plan

The Otay Ranch Pit Reclamation Plan was prepared in accordance with the Surface Mining and Reclamation Act (SMARA) of 1975. The reclamation plan details (1) the beginning and expected ending dates for each phase of mining activities; (2) all reclamation activities required; (3) criteria for measuring completion of specific reclamation activities; and (4) estimated costs for completion of each phase of reclamation. The total land area included in the adopted reclamation plan totals 157.7 acres. As described in the reclamation plan, the ultimate reclamation of the quarry would occur in a manner that would facilitate future development within this area consistent with the City's General Plan. Additionally, the adopted reclamation plan includes a biological restoration plan designed to reclaim previously disturbed Preserve areas back to a level consistent with the surrounding undisturbed open space Preserve areas. Reclamation of the disturbed Preserve areas is not scheduled to occur until the completion of extraction activities associated with Sub-phase 5.3 and Sub-phase 5.4, respectively, which is approximately 25 years from present. Given the temporary, short-term nature of the project, no

adverse impacts are anticipated that would prevent the ultimate reclamation of this site as detailed in the currently approved reclamation plan RP 79-09.

Zoning

Current zoning for the site is Planned Community (PC). The proposed CORR event is allowed subject approval of a CUP by the City Council as provided for in the Unclassified Use Section 19.54 of the Municipal Code. Because the use is temporary, it will not require amendments to the Chula Vista General Plan, or the Otay Ranch GDP.

City of Chula Vista Multiple Species Conservation Program Subarea Plan

The Multiple Species Conservation Program (MSCP) Subarea Plan was prepared by the City of Chula Vista in coordination with the Federal and State Regulatory agencies in order to implement the MSCP Subregional Plan within the City of Chula Vista. The City Council adopted the MSCP Subarea Plan on May 13, 2003. Subsequently, the Wildlife Agencies issued the City a Take Permit and signed the Implementing Agreement granting the City Take Authorization on January 11, 2005.

The existing quarry site is recognized by the City's MSCP Subarea Plan as a legal, non-conforming use, in operation at the time the underlying zone was established. As such, existing mining activities have continued to operate under legally existing permits. Potential indirect impacts to the City's MSCP Subarea Plan are discussed below in Section F.

F. PUBLIC COMMENTS

On April 9, 2007, a Notice of Initial Study was circulated to property owners and residents within a 500-foot radius of the proposed project site. The notice period ended April 19, 2007.

G. IDENTIFICATION OF ENVIRONMENTAL EFFECTS

The City of Chula Vista determined that the proposed project would have significant environmental effects (see the Environmental Checklist included in this MND). All of these effects have been mitigated to below significance by project design or mitigation measures (see Section H and the attached MMRP). The preparation of an Environmental Impact Report will not be required. This Mitigated Negative Declaration has been prepared in accordance with Section 15070 of the State CEQA Guidelines.

Aesthetics

The proposed project would occur over two non-consecutive weekends and does not propose any permanent structures or improvements. The total area that would be used by the proposed event activities encompasses approximately 154 acres, of which 35.6 acres have already been disturbed through mineral extraction. Only minor surface preparation activities will be required for the proposed event. As previously noted, only minor site preparation is required, and therefore, no modifications to existing natural landform would occur, therefore there would be no impacts associated with grading. No grading permit will be required.

The proposed activities would include temporary tent-like structures, spectator stands, shade canopies, and portable restroom facilities as well as parked vehicles that would be visible from some public and private vantages points primarily to the south and west. Nighttime security lighting would be allowed in the pit areas and overnight camping areas located on the west and south of the track facility (Figure 3). The night lighting would be visible from residential areas to the south of the site.

The project will be required to comply with the light and glare regulations (Section 19.66.100) of the Chula Vista Municipal Code (CVMC). Compliance with these regulations will ensure that no significant glare, or light would affect daytime or nighttime views in the surrounding residential neighborhood area or adjacent roadways. Additionally, lighting will be directed downward and away from adjacent MSCP Preserve areas.

Because the nighttime lighting would be temporary, occurring over two independent weekends, the proposed project would not permanently alter the aesthetic or visual character of the site or result in a new source of substantial light or glare. Therefore, the proposed 2007 CORR event is not anticipated to result in significant impacts to aesthetics.

Air Quality

An air quality technical report was prepared by Scientific Resources Associated (April 2007) for the project. Project related emissions would occur from vehicles traveling to the CORR event site, race vehicle emissions generated during race events and dust generated by the racing activities. All mining activities associated with the existing quarry will cease during race events.

Race Event Phase

The operational impacts associated with the Project would be confined to impacts associated with automotive traffic from spectators, employees, support vehicles, and the race participants.

Fugitive dust emissions from the racing events themselves were estimated based on the U.S. EPA's emission factors for travel on unpaved roads from the *Compilation of Air Pollutant Emission Factors* (AP-42), Section 13.2 (U.S. EPA 2003). The emissions from unpaved roads are estimated to be 489.56 pounds per day.

It should be noted that the majority of the PM10 emissions predicted by the URBEMIS model are attributable to road dust from vehicles traveling on paved roads to the event; these emissions are based on the default assumptions within the URBEMIS model, and assume that $4.71 \, \text{lbs/day}$ PM₁₀ are attributable to vehicle exhaust, with 79.93 lbs/day attributable to road dust. PM_{2.5} emissions have been estimated in accordance with the SCAQMD guidelines (SCAQMD 2006) as discussed under construction emissions.

Emissions of VOCs and NOx, would be below screening criteria for daily emissions thresholds. Fugitive dust emissions (both PM_{10} and $PM_{2.5}$) would be above the screening thresholds without mitigation. Project mitigation is incorporated to provide for spraying of water during the 15-minute intervals between races, to control fugitive dust; thus there will be a minimum of 6 passes (6 races per day). Based on the control efficiency in the URBEMIS 2002 model, 3 passes of watering per day provides a 51% control efficiency on unpaved roads; therefore it was assumed that 6 passes per day would provide a 90% control efficiency. This would be consistent with the SCAQMD CEQA Air Quality Handbook (SCAQMD 1993), which projects a control efficiency of up to 85% for watering three times daily on unpaved roads. Implementation of this mitigation would reduce emissions of PM10 and PM2.5 to below the significance thresholds.

Emissions of CO are be above the screening criteria for significance. Therefore, the next tier of analysis, a CO "hot spots" analysis, was performed to determine the actual significance of the impact.

Projects involving traffic impacts may result in the formation of locally high concentrations of CO, known as CO "hot spots." To verify that the project would not cause or contribute to a violation of the CO standard, a screening evaluation of the potential for CO "hot spots" was conducted in accordance with guidance in the Caltrans ITS Transportation Project-Level Carbon Monoxide Protocol (Caltrans 1998).

Project effects were modeled using the CALINE4 model. The CO concentrations predicted by the model, in addition to the high 1-hour background concentration, resulted in a total concentration of less than 10 parts per million (ppm), which is below the CO standard of 20 ppm. Therefore impacts related to CO hot spots are less than significant, and the project would not expose sensitive receptors to substantial pollutant concentrations of CO.

All portable generators required for the race events would either be registered by the APCD, or would have appropriate permits; therefore the emissions from portable generators are not included in this analysis.

Post Race Event Phase

Once the operation phase of the project has been completed, emissions would be generated from the transport of any contaminated soil (i.e., oil and gasoline from on-site vehicles) from the project site to appropriate disposal locations approved by local, state, and federal agencies. If required for site cleanup, it is anticipated that soil would be transported off-site.

In addition, after the racing event is completed, the project site would be retained in its preproject condition. Hence, one additional truck would be traveling to and from the project site, post project operation.

The quantity of trucks traveling to and from the project and amount of soil being disturbed during the post-operation phase is anticipated to be the same or less than what would be generated during the site preparation phase and therefore, post-operation emissions are anticipated to be less than significant. No mitigation measures are required.

The mitigation measures contained in Section H below would mitigate short-term operational air quality impacts to below a level of significance. These measures are included as a part of the Mitigation Monitoring and Reporting Program.

Agricultural Resources

Historically, portions of the project site that contain the proposed parking areas in Village Three, and the camping area in Otay River Valley have been used for dry farming, as well as cattle and sheep grazing. Crop production was limited to hay and grains (typically barley) due to limited water availability. The project area does not contain designated Prime Farmland, Farmland of Statewide Importance or Unique Farmland (United States Department of Agriculture, Soil Conservation Service, California Department of Agriculture). The site has been locally designated as Farmland of Local Importance and is identified as Grazing Land. No land within the project area is subject to the Williamson Act.

The former agricultural fields will be utilized for parking and camping. The fields have been harvested, and the remaining vegetation has been mowed. Thus, the temporary parking and camping on the fields will not preclude used of the land for agricultural purposes after the race events. Therefore, impacts to agricultural uses on the site would be less than significant.

Biological Resources

Implementation of the proposed project would result in direct impacts to the following vegetation communities: annual (non-native) grassland (103.4 acres) and developed/disturbed land (38.0 acres). Furthermore, all of the 103.4 acres of impacts to annual grassland are within former agriculture areas of the Parking and Camping areas. Site preparation for these areas will consist of mowing only, and no soil-disturbing site preparation (i.e., grading activities) is proposed. Therefore, impacts to annual grassland within the Parking and Camping areas would be temporary and would not result in permanent or significant adverse impacts to annual grasslands. These areas would not require active restoration for recovery to pre-project conditions. Freshwater marsh, mixed riparian scrub, and southern willow scrub within the survey area would be avoided and not be directly impacted by the project.

During the course of the site visit, two individual male coastal California gnatcatchers were observed in disturbed coastal sage scrub outside of the project's direct impact area (see *Figure 5*). In addition to the two gnatcatcher locations identified in recent surveys, *Figure 5* also shows locations of previously identified locations for gnatcatcher and least Bell's vireo, to provide context for potentially suitable habitat for these species, and to help understand the nature and extent of potential indirect effects.

The annual grasslands identified in the Parking and Camping Areas could serve as potentially suitable habitat for burrowing owl. To avoid direct impacts to burrowing owl, pre-construction surveys will be required (February through August – therefore only applicable to the June race event). If owls are found to be nesting as a result of the surveys, the active nest areas will be avoided and fenced as appropriate.

No long-term, direct impacts to sensitive vegetation communities would result from project implementation. Direct impacts to active burrowing owl nests could result if nests are present at the time of operation during the nesting season (June race only).

The project site is located adjacent to the City's MSCP Preserve. Implementation of the proposed project will result in indirect impacts to sensitive habitat and species found within the Preserve. In order to reduce indirect impacts to the Preserve, the project will be required to adhere to specific guidelines established in the Adjacency Management Issues discussion in the Chula Vista MSCP Subarea Plan (Section 7.5.2 of the Subarea Plan). The following is a summary of the requirements relevant to the proposed project, and a discussion of project compliance.

<u>Drainage/Toxics:</u>

All developed and paved areas must prevent the release of toxins, chemicals, petroleum products, exotic plant materials and other elements that might degrade or harm the natural environment or ecosystem processes within the Preserve.

The project would involve the use, transport, storage, handling and disposal of toxic substances such as gasoline and other automotive fluids. Use of these substances onsite would occur for the short duration of time of the racing event. No use of these substances would occur in the MSCP Preserve, which is located approximately 150 feet from the edge of the racetrack and over 500 feet from the pit area. As discussed under the Hazards and Hazardous Materials section, BMPs would be implemented during all phases of the project to mitigate for potential impacts associated with hazardous waste/toxins entering drainages. These BMPs are specified in Appendix A and require City review and approval by the Director of Public Works.

The following summarizes the BMPs from Appendix A, and are required to reduce effects associated with drainage and toxics to less than significant levels, as required by the Subarea Plan:

<u>Containment Areas</u> - BMP's utilized during Race Events include secondary containment at vehicle maintenance (pit) areas, hazardous materials storage areas, vehicle wash stations, portable bathrooms, trash disposal and materials storage areas. Additionally, any fuel drum storage and used oil storage areas will be contained and also bermed. Hazardous materials are to be placed in closed containers to prevent contact with runoff and to prevent spillage to the storm water conveyance system. Secondary containment, such as berms or dykes, will also be provided. Vactor trucks will be used to remove runoff from the containment areas and the collected runoff will be disposed of in accordance with City standards. Hazardous Waste containers will remain covered at all times. Run-on from adjacent areas will be prevented from coming into contact with the containment areas. Attached lids are provided on all trash containers to minimize direct precipitation.

<u>Site Runoff</u> – Two desilting basins will be used as retention basins. Outlets will be blocked off so that no runoff will be allowed to discharge from these basins. At the conclusion of each racing event, accumulated debris and pollutants will be removed from these basins and disposed of in accordance with City standards. An existing perimeter fence is located at the limits of grading to prevent the escape of wind blown trash and debris. There is an existing earthen berm along the southern edge of the proposed race track facilities that will also ensure any direct run-off into the Otay River.

<u>Maintenance</u> - Dust and trash control measures are included as well. To further inhibit sediment migration, the track is watered between races. Access roads and parking areas will be routinely

watered as well. Onsite trash collection is provided throughout the event. Parking areas are graded, with silt fences and bio-filters along the perimeter to treat oil and grease from parked vehicles.

There are no permanent utilities at the site. Generators, water trucks, a vactor truck, and portable bathroom facilities will be utilized. No temporary facilities will remain on site after the final race event. Long term maintenance of all remaining BMP's are the responsibility of James P. Baldwin and Associates who guarantee performance of proper BMP maintenance by the posting of a performance bond as required by the City of Chula Vista.

<u>Access Roads</u> - There are three proposed access roads into the site. This will be used for public access and emergency access during race events. The main entrance to the facility is from the intersection of Main Street and Heritage Road and runs eastward on Wiley Road toward the existing rock quarry. The main access road will have a crushed asphalt base 6" in depth, for the first 200' from the point of entry. Maintenance will be continuous during race events. The Applicant will be responsible for the maintenance of these construction entrances and all other BMP's described herein. Access to the parking area within Village Three is proposed from Energy Way to the west. In addition, access to the camping area is proposed from Heritage Road.

<u>Tracking</u> - To insure that no tracked sediment reaches the storm drain system, a sweeper truck is employed to remove any sediment deposited onto Main Street or Heritage Road due to increased traffic during race events. All efforts will be made to prevent mud from being tracked onto public roads. In no case will vehicles be permitted to drive on, or park in muddy areas, or to leave the site without first removing any accumulations of loose mud. In the event of rain, all race events will be rescheduled.

<u>Wind Erosion/Dust Control</u> - Silt fencing is provided at the limits of grading to prevent escape of trash, debris or sediment to the surrounding area. This BMP is designed to capture wind-blown pollutants. To enhance the dust control efforts, the track will be watered extensively between races. To enhance trash control efforts, onsite trash collection is provided throughout race events.

Lighting:

Lighting of all developed areas adjacent to the Preserve should be directed away from the Preserve wherever feasible and consistent with public safety. Where necessary, development should provide adequate shielding to protect the Preserve and sensitive species from night lighting.

Temporary safety lighting associated with the project would be limited to the pit area, spectator area and camping area. The lighting for these areas would be directed downward, and away from

the Preserve. The portion of the project that is located adjacent to the Preserve is the track area. The track portion of the project site would not be lighted, and no race events would occur at night. Light spillage into the Preserve would be considered significant.

Noise:

Uses in or adjacent to the Preserve should be designed to minimize noise impacts. Berms or walls should be constructed adjacent to commercial areas and any other use that may introduce noises that could impact or interfere with wildlife utilization of the Preserve. Excessively noisy uses or activities adjacent to breeding areas, including temporary grading activities, must incorporate noise reduction measures or be curtailed during the breeding season of sensitive bird species.

As discussed in the Noise analysis of this MND, noise resulting from project related activities includes noise associated with vehicle racing, loudspeakers, or other incidental sound sources associated with the events. Species of concern relative to this policy (i.e. sensitive bird species) include the coastal California gnatcatcher and least Bell's vireo.

Because the project site is adjacent to the MSCP Preserve, analysis of noise impacts on noise sensitive species within the MSCP Preserve is required. Specifically, the Subarea Plan restricts uses located adjacent to Preserve areas that generate excessive noise during the breeding season for noise sensitive bird species. In this particular case, the species of concern are the Least Bell's Vireo and Coastal California Gnatcatcher, because their habitat is located within the Preserve. The City's MSCP Subarea Plan does not provide a specific numerical threshold for operational noise affecting these species, but for comparative purposes, a generally accepted standard used to evaluate impacts is a one-hour average noise level greater than 60 dB. No other species identified in the Subarea Plan or MSCP Sub regional Plan as having specific conditions related to noise impacts are located within the portions of the MSCP Preserve in the vicinity of the project.

The noise analysis prepared for the project (Environmental Noise Assessment for the Temporary Off-Road Race Track, Dudek & Associates, April 16, 2007) provides an estimate of noise levels generated by the proposed project. Unattenuated noise levels at the closest sensitive habitat location within the Preserve, immediately adjacent to the south of the proposed track, are estimated to be 85 dB hourly Leq.

Taking the existing terrain topography into consideration, and providing the maximum sound attenuation available through structural design features (enclosure of the rear of the stands located between the track and the Preserve), the noise analysis concludes that areas having potential to support least Bell's vireo and coastal California gnatcatcher are expected to be exposed noise levels of approximately 75 dB hourly Leq noise level during the racing events.

Ambient noise measurements were recorded within the project area, as noted in the Noise Assessment. Ambient noise within the project area is primarily associated with the existing rock quarry operation, including rock and gravel extraction, earth moving equipment, and rock crushing activities. Ambient noise measurements in portions of the quarry adjacent to sensitive habitat areas within the Preserve indicate noise levels of up to 78 dB Leq. The noise recording locations are within close proximity to areas historically occupied by California gnatcatcher and least Bell's vireo, suggesting that there may be localized tolerance of elevated noise levels by these species in this area.

Due to the short-term nature of the proposed project (two consecutive days during the nesting season), and existing elevated ambient noise levels, it is not anticipated that the project will result in significant indirect impacts on these noise sensitive species.

Invasives:

No invasive non-native plant species shall be introduced into areas immediately adjacent to the Preserve.

The project does not propose landscaping that would introduce invasive species, and the erosion control BMPs specifically require that native plant species be used. Unauthorized access and/or predation by domestic pets may result from introduction of the human use adjacent to the Preserve. To avoid such adverse effects, the project shall be required to provide fencing and signage to discourage access to the Preserve. In addition, the project shall be required to either prohibit domestic pets, or require that all pets remain on leases pursuant to applicable City requirements.

Implementation of the proposed temporary uses includes measures to avoid indirect impacts on the Preserve through adherence with the Subarea Plan requirements relative to adjacency management issues. Therefore, the project would not result in any conflicts with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan.

The mitigation measures contained in Section H below would mitigate potential indirect impacts to sensitive biological resources to below a level of significance. These measures are included as a part of the Mitigation Monitoring and Reporting Program.

Cultural and Paleontological Resources

Based on data reviewed from previous studies and additional testing conducted in 2007 (Archaeological Study for the Chula Vista International Raceway, Brian F. Smith and Associates, Spril, 2007), two sites (SDI-9976 and SDI-12,291b) were determined to be

significant under the guidelines set forth by the City of Chula Vista and CEQA (Section 15064.5). The remaining sites are either not significant or were located in areas outside of potential direct impacts and were not tested.

Impacts will occur to cultural resources in the parking area, the camping area, the track area and the various access roads. For most of the impacts, these are characterized as "superficial" and are related to mowing and parking.

Potential direct adverse impacts are anticipated for only two cultural resource sites, SDI-9976 and SDI-12,291(b). Measures to reduce potential impacts will focus upon preservation. Data recovery will not be required as an alternative for the mitigation of impacts, as sufficient latitude is available for organization of the project to facilitate preservation of the significant resources. For sites that are significant, or were not evaluated and are assumed to be significant, mitigation measures will include preservation and fencing.

The mitigation measures contained in Section H below would mitigate potential impacts to Archeological Rewsources to below a level of significance. These measures are included as a part of the Mitigation Monitoring and Reporting Program.

Geology and Soils

The project consists of a temporary use, and involves no grading, excavation or cutting/filling of slopes, and involves only minimal clearing and leveling activities would be conducted. The project is a temporary event taking place over two separate weekends, and no permanent structures are proposed. Therefore, the project would not expose people or structures to potential substantial adverse effects involving seismic ground shaking, seismic-related ground failure or landslides; nor would it be affected by potential unstable soils, or cause soils to become unstable, or result in or be affected by liquefaction or collapse. Further, the project does not propose the use of septic tanks or alternative wastewater disposal systems.

Erosion impacts could occur as a result of race operations. Erosion control measures and erosion BMPs are identified in Attachment A to this MND, *Implementation of Best Management Practices for Storm Water Pollution Prevention at the Otay Ranch Championship Race Track Site*, and would mitigate potential impacts resulting from erosion to less than significant. The erosion control measures identified in Appendix A would require review and approval by the Director of Public Works.

The mitigation measures contained in Section H below would mitigate potential impacts to Geology and Soils to below a level of significance. These measures are included as a part of the Mitigation Monitoring and Reporting Program.

Hazards and Hazardous Materials

The proposed project would involve the transport, storage, and handling of hazardous materials (gasoline and engine fluids) associated with the proposed activities for a short duration of time. Potential impacts resulting from exposure to or leaks/spills of hazardous materials may occur; however, BMPs would be in place that would reduce potential impacts to less than significant. The BMPs are identified in Appendix A and are identified as mitigation measures in Section H of this document. BMPs include features such as special drums that would serve as selfcontained treatment for all runoff from maintenance bays (pit areas), vehicle and equipment wash areas, bathroom areas, and trash and material storage areas. Vactor trucks would be used to remove runoff from the containment drums and the collected runoff would be disposed of in accordance with City standards. Hazardous materials would be placed in an enclosure that prevents contact with runoff or spillage to the storm water conveyance system. Storage, wash, and maintenance areas for race vehicles and hazardous materials/waste, as well as restroom areas would be lined with an impervious material to contain leaks and spills and these areas would (where feasible) have a roof or awning to minimize direct precipitation within the secondary containment area. With implementation of the BMPs, the project would not create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials, or create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment. Therefore, project impacts to these relevant thresholds would be less than significant. The project is not located in the vicinity of an existing or proposed school, nor is it on a list of hazardous materials site. Further the project is not in the vicinity of a public or private airport, and not subject to an airport land use plan. Therefore, no impacts relative to these thresholds would result.

The project is a temporary use that would not have the ability to impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan. Further, the project features include public safety plans and personnel assigned to the events to further protect public safety during the events.

Because the project is a temporary use and fire equipment and personnel will be present on the site during the proposed events, the project would not expose people or structures to a significant risk of loss, injury or death involving wildland fires.

The mitigation measures contained in Section H below would mitigate potential impacts to Hazards and Hazardous Materials to below a level of significance. These measures are included as a part of the Mitigation Monitoring and Reporting Program.

Hydrology and Water Quality

The proposed CORR events would involve activities that have the potential to result in potential impacts to hydrology and water quality. During race events, urban runoff from the site has the potential to contribute pollutants, including oil and grease, suspended solids, metals, gasoline, and pathogens to the receiving waters. Once the CORR event is complete, some portions of the site, including manufactured slopes, may be exposed and susceptible to erosion. Pollutants of concern associated with the proposed project are grouped into the following categories: sediments; metals; oil and grease; trash, debris and floatables; bacteria and viruses; and organic compounds and oxygen-demanding substances.

In order to address these issues, features have been incorporated into the project design to minimize water quality impacts. The racetrack has been designed such that runoff would drain into a treatment BMP and away from the MSCP Preserve, including Otay River and Wolf Canyon.

With project design features, potential impacts to hydrology and water quality may still occur; however, BMPs would be implemented to mitigate potential impacts to less than significant levels. The BMPs have been identified in Appendix A and require review and approval by the Director of Public Works. BMPs identified in Appendix A include, but are not limited to the following: desilt basins, special drums for containment of waste, trash and hazardous materials and silt fencing/sand bags.

Because of the scope of activities proposed and the short duration of the proposed project, the race events would not have the ability to substantially alter the flow of surface or groundwater. In addition, the project would not involve pumping of groundwater and would therefore not result in the possibility of depletion of groundwater supplies. Although portions of the project site are within the 100-year flood plain of the Otay River, the project does not propose construction of permanent structures and therefore, would not expose people or structures to a significant risk of loss, injury or death involving flooding. In addition, the proposed operations would occur outside of the rainy season.

The project would not directly discharge to an existing storm drain system and would not alter any drainage pattern. Therefore, no impact upon storm water conveyance capacities would occur.

The mitigation measures contained in Section H below would mitigate potential impacts to Hydrology and Water Quality to below a level of significance. These measures are included as a part of the Mitigation Monitoring and Reporting Program.

Noise

An Acoustical Analysis was prepared by Dudek and Associates (April 2007) for the proposed project which is summarized below.

The existing noise levels at the site were monitored to determine ambient noise levels in the project vicinity, including areas adjacent to and within the MSCP Preserve. On site noise monitoring results indicate the existing noise levels at the monitored locations to range between 68 and 78 dBA.

Applicable Standards

The City of Chula Vista has adopted a quantitative noise ordinance to control excessive noise generated in the City. The ordinance limits are in terms of a one-hour average sound level. The allowable noise limits depend upon the noise receiving land use and time of day. The City's noise ordinance states that if the measured ambient level exceeds that permissible by the land use standards, the allowable noise exposure standard shall be the ambient noise level. The ambient level shall be measured when the alleged noise violations source is not operating. If the measured ambient noise level without the subject noise source exceeds the applicable land use limit, the allowable one-hour average noise levels shall be the ambient noise level.

The City of Chula Vista noise ordinance exterior noise limit for single-family residences is 45 dB between 10 p.m. and 7 a.m. on weekdays, and between 10 p.m. and 8 a.m. on weekends. The daytime (between 7 a.m. and 10 p.m. on weekdays, and between 8 a.m. and 10 p.m. on weekends) exterior noise limit is 55 dB. The project's noise generating activities will occur during daytime, i.e., between 7 a.m. and 7 p.m. on weekdays, and between 8 a.m. and 7 p.m. on weekends. Consequently the 55 dB exterior noise criteria has been used for our evaluation of the project's potential noise impacts upon the closest residences, located at approximately 6,000 feet or more to the southwest of the site in the City of San Diego. The 70 dB exterior noise criteria has been used for our evaluation of the project's potential noise impacts upon the industrial land use at approximately 1,000 feet distance, southwest of the project site.

Chapter 19.68 Section 19.68.060 of the City of Chula Vista Municipal Code exempts occasional outdoor gatherings, public dances, shows and sporting and entertainment events, provided the events are conducted pursuant to a permit or license issued by the city relative to the staging of the events.

The City's General Plan Noise Element contains land use/noise compatibility guidelines for various types of uses. The City considers an annual noise level of 65 dB CNEL to be compatible with residential land uses. The General Plan states that the compatibility guidelines are not

intended to conflict with or contradict the Noise Ordinance, but provide guidance for total noise exposure, including traffic noise and other sources that are not regulated by the Noise Ordinance.

The following analysis provides a complete assessment of project related noise, including traffic noise, and therefore addresses impacts in accordance with the Noise Ordinance, the General Plan guidelines, and the MSCP Subarea Plan. Noise issues related to sensitive biological resources are addressed above under the subheading Biology.

Several activities associated with the race event would contribute to the overall potential noise impact of the project, including off-road racing, public address system, generators, and miscellaneous activities, such as revving engines and vehicles in various parking lot areas. The noise levels associated with these events and activities have been evaluated based on noise measurements previously conducted during various CORR racing events in the City of Chula Vista and published noise level data, as appropriate. Noise measurements taken from previous event include cumulative noise associated with race vehicle engines, loud speakers, event music and fireworks. The measured and published data have been used to calculate the noise levels at the nearest residential properties and at the adjacent noise sensitive species habitat area(s).

To determine the worse-case (loudest) noise level associated with the Championship Off-Road Racing Event, the loudest noise level monitored during CORR truck and buggy racing events in 2006 at the temporary Chula Vista CORR race track was used. These noise measurements indicate that a worse case-racing event would generate an average hourly Leq of 93 dBA at 100 feet distance from the racetrack. This 93 dBA noise level has been used as a basis to estimate the worse case hourly Leq racing events noise levels at the nearest residential area, the adjacent industrial land use, and the adjacent biological habitat.

The nearest residences are located at approximately 6,000 feet or more to the southwest of the site. This large distance from the racetrack site allows the noise source to be considered as a point source with 6 dB attenuation per distance doubling. For typical atmospheric conditions, A-weighted sound levels are attenuated by 1-dBA per 1,000 feet distance due to atmospheric absorption. The stands between the racetrack and this residential location are also expected to provide some shielding, approximately 3 to 5 dB. Applying the distance, atmospheric, and stand shielding attenuation to the 93 dBA at 100 ft racetrack noise level results in a 46 to 48 dBA noise level at the nearest residents' location. This calculated noise level does not exceed the City of Chula Vista Noise ordinance 55 dB exterior noise criteria between 7 a.m. and 10 p.m. on weekdays, and between 8 a.m. and 10 p.m. on weekends.

Based on the proposed racing schedule and the calculated hourly 48 dB racetrack level, the resulting noise levels at the nearest residential location would be less than 50 dB CNEL. This is well below the City's General Plan Noise Element 65 dB CNEL residential land use noise

compatible criteria. Therefore, the racing noise impacts from the project upon the nearest residential area is considered less than significant.

An industrial land use is located at approximately 1,000 feet distance, southwest of the project site. Applying the distance, atmospheric, and stand shielding attenuation to the 93 dBA at 100 feet racetrack noise level results in a 63 to 65 dBA noise level at the industrial land use property. This calculated noise level does not exceed the City of Chula Vista Noise Ordinance 70 dB exterior noise criteria for Light Industrial Land Uses. Therefore, the racing noise impacts from the project upon the adjacent industrial land use is considered less than significant.

The average hourly project noise levels at the adjacent industrial and nearest residences would comply with the City's 70 dB and 55 dB noise ordinance criteria for light industrial and residential land uses, respectively. As previously noted the race events would only occur for 4 days (two weekends) with individual practice runs and qualifying on Fridays. Chapter 19.68 Section 19.68.060 of the City of Chula Vista Municipal Code exempts occasional sporting and entertainment events, provided the events are conducted pursuant to a permit or license issued by the city relative to the staging of the events.

Concluding, the noise generated by the proposed project does not exceed the City's Noise Ordinance criteria during the race events, and the project would represent an occasional outdoor sporting and entertainment event that is exempt from the noise level limit provisions of the City's noise ordinance, and, consequently, is not considered a significant noise impact on surrounding land uses.

In terms of the City's CNEL noise guideline, the combined noise from all the identified race activities would be an annual CNEL of less than 50 dB at the nearest residential location. This noise level would comply with the City's 65 exterior annual CNEL noise criterion at the nearest residences. Since these residences are located in City of San Diego, it should be noted that the project noise levels would also meet the City of San Diego's 65 dB CNEL noise criterion.

Public Services

The proposed project would not involve changing land uses that would result in increased permanent demand for public services personnel, equipment and facilities or result in changes in service levels. The proposed project has the potential to result in hazards associated with accidents during the race events and therefore creates a temporary increase in demand for police and fire services. The closest fire station that would respond to an incident at the project site is located at 1410 Brandywine Ave., approximately 3 miles to the northwest.

The mitigation measures contained in Section H below would mitigate potential public services impacts to a less than significance level. These measures are included as a part of the Mitigation Monitoring and Reporting Program.

Transportation/Traffic

The proposed CORR events would be accessed via Main Street, Heritage Road, and Energy Way. The proposed events are anticipated to generate up to 7,440 vehicles per day of the event. Pay parking will be offered at the onsite parking lots. Based on the additional special event traffic and the potential for queuing to pay for parking, there is the potential for localized congestion at ingress and egress points of the project and parking impacts on City roadways during the two weekends of the proposed CORR event.

A traffic control plan is required to be prepared in accordance with City guidelines by the project applicant and submitted for review and approval by the City Engineer prior to issuance of the CUP. Elements of the traffic control plan would include, but not limited to, a description of the signage, striping, delineate detours, flagging operations and any other devices which would be used during events to guide motorists safely to parking locations from public roadways. The traffic control plan would also include provisions for coordinating with local emergency service providers regarding event times and measures for bicycle lane safety. The Plan would address parking plans for each parking lot, and would address methods to facilitate collection of parking fees to minimize queuing on public streets. The Traffic Control Plan would ensure that access and traffic flow would be maintained, and that emergency access would not be restricted. Additionally, the Plan would ensure that congestion and temporary delay of traffic resulting from the event and would be of a short-term nature. Implementation of the traffic control plan would mitigate potential impacts to circulation and parking to less than significant.

The mitigation measures contained in Section H below would mitigate potential temporary Transportation impacts to a less than significance level. These measures are included as a part of the Mitigation Monitoring and Reporting Program.

Utilities and Service Systems

The project would not result in increased demand for utilities. Because the project would be a temporary event, no permanent utilities would be constructed. Temporary generators would provide power for lighting and electricity. Portable restrooms and water would also be brought in for use during the CORR event. Trash would be collected routinely throughout the event and disposed of in approved disposal containers.

The City's existing Salt Creek Sewer Interceptor line traverses the southern limits of the existing quarry site. Any activity or operation that would restrict the City's access to this utility would be considered significant. Based on the conceptual site plans, vender tents and portions of the pit area would be situated over the pipeline. The City's Department of Public Works has stated that lightweight tents and/or canopies are permissible over the pipeline but parking of vehicles shall be prohibited. Additionally, 24-hour, unrestricted access to all manholes shall be maintained at all times during site preparation and race operations.

The mitigation measures contained in Section H below would mitigate potential utilities and service systems impacts to a less than significance level. These measures are included as a part of the Mitigation Monitoring and Reporting Program.

Thresholds

The project would not result in any of the identified growth management thresholds falling below acceptable levels, as indicated in the discussion of public services, traffic and utilities and services.

H. MITGATION NECESSARY TO AVOID SIGNIFICANT IMPACTS

Project-specific mitigation measures are required to reduce potential environmental impacts identified in this Mitigated Negative Declaration to a less than significant level. These mitigation measures are listed below and included in the Mitigation Monitoring and Reporting Program (MMRP) included as Attachment B to this MND.

Air Quality

- 1. The following project design features, have been included as mitigation measures to assure their implementation, and shall be implemented prior to commencement of each race event:
 - Workers shall perform excavation, site preparation, materials handling, and hauling in compliance with SDAPCD Regulation 4, Rules 52 and 54 regarding fugitive dust for Control of Fine Particulate Matter (PM10). Specific measures to be included in specifications shall address the maintenance of adequate moisture content in soils to be excavated and transported; the stabilization of exposed graded areas; and prevention of soil track-out from disturbed areas onto paved roads.
 - Low emission mobile heavy equipment shall be used, where feasible.

- The contractors shall obtain applicable air quality permits for any portable or stationary internal combustion engine subject to SDAPCD permit requirements.
- To reduce fugitive dust, the track area, access roads, and parking areas shall be watered at a minimum of twice a day to reduce PM10 levels.
- Excluding race vehicles operating on the designated track, spectator and maintenance vehicle speeds on unpaved roads shall not exceed 15 miles per hour.
- All trucks hauling materials subject to wind dispersal shall be watered and covered.
- All disturbed soil areas not subject to re-vegetation shall be stabilized with approved nontoxic soil binders, jute netting, or other methods, as appropriate.
- Idling time of trucks and other heavy equipment shall be minimized.
- Groundcover on the site shall be re-established through seeding and watering.
- The streets shall be swept immediately when silt is carried over to adjacent public thoroughfares.
- Engines in site preparation equipment shall be maintained by keeping them properly tuned.
- Low sulfur fuel shall be used for stationary equipment.
- Existing power sources (e.g., power poles) or clean fuel generators rather than temporary power generators shall be used, whenever feasible.
- The track shall be watered by a minimum of four trucks during each 15minute rest period.
- All parking lots within agricultural fields shall be mowed such that roots of the vegetation remain intact in order to provide soil stabilization.

• Parking lots and other areas with exposed dirt shall be watered to minimize fugitive dust, as necessary.

Biological Resources

- 2. To avoid direct impacts to potential nesting burrowing owl, pre-construction surveys will be required prior to commencement of each race event. If owls are found to be nesting as a result of the surveys, the active nest areas will be avoided and fenced as appropriate.
- 3. Prior to commencement of each race event, prominently colored, well-installed biological fencing shall be installed place wherever the project limits are adjacent to the Preserve, sensitive vegetation communities, and/or any other biological resources, as identified by a qualified monitoring biologist. Figure 3 above identifies the general location of the required fencing.
- 4. Prior to commencement of each race event "Sensitive Habitat Keep Out" signage shall be posted every 150 feet along the Preserve edge to discourage access to the Preserve. In addition, the project shall be required to either prohibit domestic pets, or require that all pets remain on leashes pursuant to applicable leash law requirements.
- 5. Prior to the commencement of race activities, a lighting plan shall be submitted to the City's Environmental Review Coordinator for review and approval. The lighting plan shall clearly demonstrate that all temporary security lighting shall be directed away and/or shielded from the Preserve to prevent any potential indirect impacts due to night lighting. Additionally, low-pressure sodium lighting shall be used to reduce these potential effects.

Cultural Resources

- 6. The area identified as significant for SDI-9976 shall be removed from the planned camping area and fenced as illustrated on Figure 8.0–1 of the approved archeological study prepared by Brian F. Smith & Associates (*An Archeological Study for the Chula Vista International Raceway, April 10, 2007*). Prior to commencement of each race event, the fencing shall be installed under the direction of the project archaeologist and shall remain for the duration of the racetrack use. No access to this site area shall be allowed during the race events.
- 7. The access road through SDI-12,291b shall be fenced prior to commencement of each race event, to prevent traffic from straying into the significant site area. The area to be fenced is illustrated on Figure 8.0–1. The fencing shall be installed under the direction of the project archaeologist and shall remain for the duration of the racetrack use. Vehicular and pedestrian traffic through the sensitive site area shall be minimized. The project

- archaeologist shall have the latitude to monitor the condition of the site during track events and to add measures as necessary to ensure the site is not adversely impacted by event activities.
- 8. Access roads or trails that pass through sites identified as significant or potentially significant shall be fenced prior to commencement of each race event to prevent intrusion into potentially sensitive areas. The fence locations are noted on Figure 8.0–1. The project archaeologist shall identify the locations of all fences and the type of fence that would be appropriate to ensure the sites are not disturbed.
- 9. Any grading, trenching, mowing, or other site preparations that might uncover archaeological materials or affect recorded sites shall be monitored by an archaeologist prior to commencement of race event preparations. In the event that the monitor identifies a potentially significant site, measures shall be initiated to evaluate the site and to implement mitigation measures as necessary to minimize impacts. Data recovery to mitigate impacts is an option, but preservation of resources is the preferred mitigation measure.
- 10. During the monitoring of mowing or other site preparations, the archaeological monitor shall collect all surface artifacts, map the locations, and report findings to the City.
- 11. All cultural materials recovered during the testing of SDI-9976 or collected during monitoring shall be prepared for permanent storage. Curation of all artifacts recovered shall be required. Curation shall be arranged at an appropriate facility and will be coordinated through the City of Chula Vista.

Geology and Soils

12. Prior to approval of the proposed CUP, the City Engineer shall approve erosion control measures and erosion BMPs as identified in Appendix A (Implementation of Best Management Practices for Storm Water Pollution Prevention at the Otay Ranch Championship Race Track Site).

Hazards and Hazardous Materials

13. Prior to approval of the proposed CUP, the City's Director of Public Works shall review and approve containment area BMPs as identified in Appendix A.

14. Prior to the approval of the CUP, the project applicant shall submit an NOI and obtain an NPDES Permit for Construction Activity from SWRCB. The SWPPP shall include a description of pollution prevention controls and practices to be utilized both during and following (post-race) raceway activities. Adherence to all conditions of the General Permit for Construction Activity is required. The SWPPP shall also include a Storm Water Sampling and Analysis Strategy (SWSAS), pursuant to the SWRCB General Construction Permit requirements.

Hydrology and Water Quality

- 15. Prior to approval of the proposed CUP, the City Engineer shall review and approve erosion control measures and erosion BMPs as identified in Attachment A.
- 16. Prior to the approval of the CUP, the project applicant shall submit an NOI and obtain an NPDES Permit for Construction Activity from SWRCB. The SWPPP shall include a description of pollution prevention controls and practices to be utilized both during and following (post-race) raceway activities. Adherence to all conditions of the General Permit for Construction Activity is required. The SWPPP shall also include a Storm Water Sampling and Analysis Strategy (SWSAS), pursuant to the SWRCB General Construction Permit requirements.
- 17. The applicant shall request a site inspection by the City's Public Works and Storm Water Inspectors after completion of site preparation, and prior to each race event. If the inspectors identify any violation of the BMPs, race events shall be delayed until such BMPs are properly implemented.
- 18. During race events, standby cleanup equipment and crews shall be available to respond to potential hazardous material spills. Significant spills shall be reported to the appropriate authorities and the City of Chula Vista as soon as such spill occur.
- 19. A qualified person shall be designated for monitoring and repair of BMPs. The name and phone number of such person shall be provided to the Storm Water Management Section prior to each race event.

Public Services

- 20. Prior to approval of the proposed CUP, the project applicant shall prepare a security plan to be approved by the Chula Vista Police Chief prior to the start of the CORR events. The security plan shall detail, among other items, the number of security personnel provided, general distribution of security throughout the race event, and number of uniformed Chula Vista police staff required.
- 21. Prior to approval of the proposed CUP, the project applicant shall prepare an emergency medical and safety plan to be approved by the Chula Vista Fire Chief. The plan shall

detail, among other items, emergency access routes, type of emergency vehicles required to adequately serve the project, alternative access routes to be employed in the event of rain or damp conditions, the variety of emergency medical services that can be provided by the contract emergency medical company, chain of communication between event sponsor and medical staff, number of ambulances present onsite and the number of uniformed Chula Vista Fire Department staff needed onsite. A fully staffed Chula Vista Fire Department engine company and Battalion Chief will be onsite during all race events.

- 22. Prior to the approval of the proposed CUP, perimeter fencing will be shown around the entire site on all plans, to the satisfaction of the City Engineer. Security personnel posted shall be posted at all access points throughout the event.
- 23. Grandstands will be protected by 10,000 pound concrete barriers along the entire frontage of the grandstand area. In addition, a 10 foot high catch fence with steel cables will run the entire length of the grandstand area.
- 24. In accordance with the approved medical plan, emergency medical equipment and personnel and ambulance will be present during the term of the race event.
- 25. In accordance with the approved security plan, both uniformed police and private security personnel will be stationed onsite and offsite, as needed.
- 26. Prior to commencement of each race event, the applicant must install protective fencing around all manhole covers (15'rad / 30'diam) for the Salt Creek Interceptor Sewer. Fencing shall consist of orange bio fencing and shall be installed to the satisfaction of the City Engineer. The Applicant shall ensure that24-hour, unrestricted access to all manholes will be maintained at all times during site preparation and race operations. Lightweight vender items located along the remainder of the sewer alignment is acceptable, but no parking will be allowed over the alignment of the sewer.

Transportation/Traffic

27. Prior to approval of the proposed CUP, a traffic control plan shall be prepared in accordance with City guidelines to the satisfaction of the Police Chief and City Engineer. Elements of the traffic control plan will include, but not limited to, a description of the signage, striping, delineate detours, flagging operations and any other devices which will be used during events to guide motorists safely to ingress locations from public roadways. The traffic control plan will also include provisions for coordinating with local emergency service providers regarding event times and measures for bicycle lane safety. The Traffic Control Plan will ensure that access and traffic flow will be maintained, and that emergency access will not be restricted. Parking lot attendants will direct attendees to vacant parking spaces within the parking lots.

I. AGREEMENT TO IMPLEMENT MITIGATION MEASURES

By signing the line(s) provided below, the Applicant and Operator stipulate that they have each read, understood and have their respective company's authority to and do agree to the mitigation measures contained herein, and will implement same to the satisfaction of the Environmental Review Coordinator. Failure to sign the line(s) provided below prior to posting of this Mitigated Negative Declaration with the County Clerk shall indicate the Applicant's and Operator's desire that the Project be held in abeyance without approval and that the Applicant and Operator shall apply for an Environmental Impact Report.

Printed Name and Title of Applicant (or authorized representative)	Date
Signature of Applicant (or authorized representative)	Date
N/A	
Printed Name and Title of Operator (if different from Applicant)	Date
<u>N/A</u>	
Signature of Operator	Date
(if different from Applicant)	

J. CONSULTATION

1. Individuals and Organizations

City of Chula Vista

Glen Laube, Environmental Projects Manager
Marisa Lundstedt, Environmental Projects Manager
Rick Rosaler, Principal Planner
Jamal Naji, Assistant Civil Engineer, Land Development
Khosro Aminpour, Civil Engineer, Land Development
Erik Steenblock, Environmental Health Specialist
Don Redmond, Police Department

Doug Perry, Fire Department
Amy Linquist, Fire Department
Kirk Ammerman, Public Works
Harold Phelps, Associate Planner, Planning Department
Wendy Loeffler, Biologist, RECON
Cheryl Johnson, Acoustical Analyst, RECON

Others

James P. Baldwin, Championship Off Road Racing, Applicant Ranie Hunter, Applicant Representative Joe Monaco and Mike Komula, Dudek and Associates Valorie Thompson, Scientific Resources Associated

2. <u>Documents</u>

- Otay Ranch General Development Plan/Subregional Plan Program EIR (Program EIR 90-01), October, 1993.
- Archaeological Study for the Chula Vista International Raceway, Brian F. Smith and Associates, April, 2007.
- Environmental Noise Assessment for the Temporary Off-Road Race Track, Dudek & Associates, April 9, 2007.
- Biological Resources and Impacts Analysis Letter for Championship Off Road Racing, Chula Vista, California, Dudek, April 2007
- Biological Resources Report and Impact Assessment for Otay Ranch Villages Two and Three, Dudek, February, 2006.
- Air Quality Technical Report for the Championship Off-Road Racing Event, Scientific Resources Associated, April, 2007.
- Final Second Tier EIR for Villages Two, Three and Four (portion) SPA and TM, City of Chula Vista.

3.	Initial	Study

This environmental determination is based on the attached Initial Study, and any
comments received in response to the Notice of Initial Study. The report reflects the
independent judgment of the City of Chula Vista. Further information regarding the
environmental review of this project is available from the Chula Vista Planning and
Building Department, 276 Fourth Avenue, Chula Vista, CA 91910.

	Date:	
Glen Laube		
Environmental Projects Manager		

Attachment A

IMPLEMENTATION OF BEST MANAGEMENT PRACTICES

FOR

STORM WATER POLLUTION PREVENTION

AT THE PROPOSED

TEMPORARY CHULA VISTA RACEWAY SITE

The Chula Vista Raceway site improvements are scheduled to be completed by June of 2007, with the initial racing event scheduled for June 9th and 10th, 2007. There is an additional race event scheduled for Sept. 29th and 30th, 2007. Improvements associated with the production of race events will be temporary, and will be removed upon completion of the final race event. A site-specific Storm Water Pollution Prevention Plan (SWPPP) has been developed, and will be used during the grading phase and also will be followed during all race events held at the site.

It is the intention of James P. Baldwin and Associates to take all necessary precautions to prevent any instances of storm water pollution from occurring due to activities at this site. In order to achieve and maintain compliance with all applicable storm water regulations, operations at the site will incorporate the use of Best Management Practices as described in the SWPPP as approved by the City of Chula Vista, as well as any additional requirements imposed by the City.

After all construction related activities at the site have been completed, a Notice of Termination will be filed with the State of California, leaving discharges associated with future operations at the site subject to regulation under the jurisdiction of the City of Chula Vista Storm Water Ordinance, County of San Diego Hazardous Waste Storage and Disposal Regulations, and current NPDES regulations.

Best Management Practices have been developed for racing events at the Chula Vista Raceway site, and will be implemented before any vehicle traffic is permitted on the race course. A description of these BMP's would include the following:

EXISTING BMP's

<u>Construction Activities</u> – Improvements at the site consist of a temporary gravel race track, placement of temporary bleachers, fencing, vendor facilities (trailers), portable sanitation, gravel access roads, parking lots, storage areas, vehicle maintenance facilities (pit area), vehicle wash station, hazardous waste containment area, and trash storage areas. All temporary improvements will be removed from the site at the conclusion of the final race event.

<u>Erosion / Sediment Control</u> – BMP's for erosion and sediment control may include the use of geotextiles, erosion control blankets, tackifier and bonded fiber matrix (BFM). Silt fences are used at the perimeter of disturbed areas, with gravel bag reinforcement in all areas of concentrated flows. In natural watercourses, additional gravel bags are used to supplement silt fences, providing additional erosion control and velocity reduction. The locations of erosion control BMP's are shown on the Erosion Control in the SWPPP.

<u>Stabilization</u> - All disturbed areas will be temporarily stabilized, until permanent methods of stabilization can be utilized. Temporary and permanent examples of BMP's for sediment control include the use of silt fences, gravel bags, fiber rolls and sedimentation basins.

Finally, the racetrack will be graded along ridge lines, or elevated such that all runoff from the track drains toward a treatment BMP where ever possible Treatment BMPs such as bio-swales, hay bales, etc are used in areas of minor slopes where runoff does not drain directly to a retention basin.

RACE EVENT BMP's

<u>Containment Areas</u> - BMP's utilized during Race Events include secondary containment at vehicle maintenance (pit) areas, hazardous materials storage areas, vehicle wash stations, portable bathrooms, trash disposal and materials storage areas. Additionally, any fuel drum storage and used oil storage areas will be contained and also bermed. Hazardous materials are to be placed in closed containers to prevent contact with runoff and to prevent spillage to the storm water conveyance system. Secondary containment, such as berms or dykes, will also be provided. Vactor trucks will be used to remove runoff from the containment areas and the collected runoff will be disposed of in accordance with City standards. Hazardous Waste containers will remain covered at all times. Run-on from adjacent areas will be prevented from coming into contact with the containment areas. Attached lids are provided on all trash containers to minimize direct precipitation.

<u>Site Runoff</u> – Two desilting basins will be used as retention basins. Outlets will be blocked off so that no runoff will be allowed to discharge from these basins. At the conclusion of each racing event, accumulated debris and pollutants will be removed from these basins and disposed of in accordance with City standards. An existing perimeter fence is located at the limits of grading to prevent the escape of wind blown trash and debris. There is an existing earthen berm along the southern edge of the proposed race track facilities that will also ensure any direct run-off into the Otav River.

<u>Maintenance</u> - Dust and trash control measures are included as well. To further inhibit sediment migration, the track is watered between races. Access roads and parking areas will be routinely watered as well. Onsite trash collection is provided throughout the event. Parking areas are graded, with silt fences and bio-filters along the perimeter to treat oil and grease from parked vehicles.

There are no permanent utilities at the site. Generators, water trucks, a vactor truck, and portable bathroom facilities will be utilized. No temporary facilities will remain on site after the final race event. Long term maintenance of all remaining BMP's are the responsibility of James P. Baldwin and Associates who guarantee performance of proper BMP maintenance by the posting of a performance bond as required by the City of Chula Vista.

<u>Access Roads</u> - There is one proposed access roads into the site. This will be used for public access and emergency access during race events. The main entrance to the facility is from the intersection of Main Street and Heritage Road and runs eastward on Wiley Road toward the existing rock quarry. The main access road will have a crushed asphalt base 6" in depth, for the first 200' from the point of entry. Maintenance will be continuous during race events. James P. Baldwin & Associates and Championship Off Road Racing (CORR) will be responsible for the maintenance of these construction entrances and all other BMP's described herein.

<u>Tracking</u> - To insure that no tracked sediment reaches the storm drain system, a sweeper truck is employed to remove any sediment deposited onto Main Street or Heritage Road due to increased traffic during race events. All efforts will be made to prevent mud from being tracked onto public roads. In no case will vehicles be permitted to drive on, or park in muddy areas, or to leave the site without first removing any accumulations of loose mud. In the event of rain, all race events will be rescheduled.

<u>Wind Erosion/Dust Control</u> - Silt fencing is provided at the limits of grading to prevent escape of trash, debris or sediment to the surrounding area. This BMP is designed to capture wind-blown pollutants. To enhance the dust control efforts, the track will be watered extensively between races. To enhance trash control efforts, onsite trash collection is provided throughout race events.

POST CONSTRUCTION BMP's

<u>Desilt Basins</u> - Runoff from the track drains to at least three infield retention basins. These basins are designed as retention basins. In other words, no runoff is allowed to discharge from these basins. The remaining portion of the track facilities will drain to two retention basins located near the southern boundary. These basins will have no outlets, and will serve as treatment for runoff from the remaining portion of the race track and areas to the west of the track.

<u>Site Runoff</u> - A perimeter silt fence is located at the grading limits to prevent the discharge of trash, debris or sediment to the surrounding area.

<u>Vegetation</u> – Existing vegetation has been retained where ever possible. The site will revert to the existing use as a rock quarry after the final race event.

FUTURE SITE CONSIDERATIONS

BMP's for the prevention of Storm Water Pollution, including but not limited to the above described items, will remain in place until the conclusion of race events at this location.

The site will revert to its current use as a rock quarry at the conclusion of scheduled racing events. A site specific SWPPP along with approved BMP's will be implemented for future rock quarry operations.